

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi @jsitel.com

June 28, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 14-58

2017 ETC Annual Report of Citizens Telephone Company of Hammond NY

Study Area Code 150081

Dear Ms. Dortch:

On behalf of Citizens Telephone Company of Hammond NY ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules. Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information. The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall JSI Vice President

301-459-7590

jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

FCC Form 481 FCC Form 481 - Carrier Annual Reporting REDACTED FOR PUBLIC INSPECTION MB Control No. 3060-0986/OMB Control No. 3060-0819 Data Collection Form

| Study Area Code | 150081 |
|---|--|
| Study Area Name | CITIZENS HAMMOND NY |
| Program Year | 2018 |
| Contact Name: Person USAC should contact with questions about this data | Mark DePerrior |
| Contact Telephone Number: Number of the person identified in data line <030> | 3153245911 ext. |
| Contact Email Address: Email of the person identified in data line <030> | markcpa@cit-tele.com |
| Form Type | 54.313 and 54.422 |
| | Study Area Name Program Year Contact Name: Person USAC should contact with questions about this data Contact Telephone Number: Number of the person identified in data line <030> Contact Email Address: Email of the person identified in data line <030> |

| (200) Service Outage Reporting (Voice) | FCC Form 481 |
|--|---|
| Data Collection Form | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | July 2013 |

| <010> | Study Area Code | | | | | | | | | | | |
|-------|--|-----------------|----------------|------------------|------------------|--------------|-----------|---------|---------|---------|---------|---------|
| <015> | Study Area Na | ame | | | | CITIZENS HAI | MMOND NY | | | | | |
| <020> | Program Year | • | | | | 2018 | | | | | | |
| <030> | Contact Name | e - Person USAC | should contac | t regarding this | s data | Mark DePerr | ior | | | | | |
| <035> | > Contact Telephone Number - Number of person identified in data line <030> | | | |)> 3153245911 | ext. | | | | | | |
| <039> | 9> Contact Email Address - Email Address of person identified in data line <030> | | | | O> markcpa@cit | -tele.com | | | | | | |
| <210> | For the prior | r calendar yea | ar, were there | e any reporta | ble voice servic | e outages? | No | | | | | |
| <220> | <a> | <b1></b1> | <b2></b2> | <b3></b3> | <b4></b4> | <c1></c1> | <c2></c2> | <d></d> | <e></e> | <f></f> | <g></g> | <h></h> |

| ٠. | <a> | <01> | <02> | <03> | <04> | <c1></c1> | <c2></c2> | <a> | <e></e> | <1> | <g></g> | <n></n> |
|----|---------------------------------------|--------------|--------------|------------|------------|--------------------|-----------------|----------------|--------------------|-----------------|----------------|--------------|
| | NORS | | | | | | | | | Did This Outage | | |
| | | Outage Start | Outage Start | Outage End | Outage End | Number of | | 911 Facilities | Service Outage | Affect Multiple | | |
| | Number | Date | Time | Date | | Customers Affected | Total Number of | Affected | Description (Check | | Service Outage | Preventative |
| | · · · · · · · · · · · · · · · · · · · | Dute | | Dute | Time | customers Arrected | Customers | (Yes / No) | all that apply) | (Yes / No) | Resolution | Procedures |
| | | | | | | | Customers | (162 / NO) | all tilat apply) | (1es / NO) | Resolution | riocedules |
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| • | fulfilled Service Request lection Form | | | | | FCC Form 481 OMB Control No. 3060-0986/OMB Control July 2013 | ol No. 3060-0819 |
|--|--|--------------------|---------------------------|--|--|--|------------------|
| | | | | | | | |
| <010> | Study Area Code | | 150081 | | | | |
| <015> | Study Area Name | | CITIZENS HAMMOND NY | | | | |
| <020> | Program Year | | 2018 | | | | |
| <030> | Contact Name - Person USAC should contact regarding th | s data | Mark DePerrior | | | | |
| <035> | Contact Telephone Number - Number of person identified | in data line <030> | 3153245911 ext. | | | | |
| <039> Contact Email Address - Email Address of person identified in data line <030> markcpa@cit-tele.com | | | | | | | |
| <300> U | Infulfilled service request (voice) | | 0 | | | | |
| <310> [| Detail on attempts (voice) | | | | | | |
| | | Nam | ne of Attached Document | | | | |
| <320> | Unfulfilled service request (broadband) | | 0 | | | | |
| <330> | Detail on attempts (broadband) | | | | | | _ |
| | | 1 | Name of Attached Document | | | | |

| (400) Number of Complaints per 1,000 customers | FCC Form 481 |
|--|---|
| Data Collection Form | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | July 2013 |

| <010> | Study Area Code 150081 | |
|-------|--|---|
| <015> | Study Area Name | HAMMOND NY |
| <020> | Program Year | |
| <030> | Contact Name - Person USAC should contact regar | ding this data Mark DePerrior |
| <035> | Contact Telephone Number - Number of person id <030> | entified in data line 3153245911 ext. |
| <039> | Contact Email Address - Email Address of person in <030> | dentified in data line markcpa@cit-tele.com |
| <400> | Select from the drop-down list to indicate how you voice complaints (zero or greater) for voice telephocalendar year for each service area in which you are any facilities you own, operate, lease, or otherwise | ony service in the prior Offered both fixed and mobile voice e designated an ETC for |
| <410> | Complaints per 1000 customers for fixed voice | 0.0 |
| <420> | Complaints per 1000 customers for mobile voice | 0.0 |
| <430> | Select from the drop-down list to indicate how you end-user customer complaints (zero or greater) fo the prior calendar year for each service area in wh an ETC for any facilities you own, operate, lease, o | r broadband service in Offered both fixed and mobile broadband ich you are designated |
| <440> | Complaints per 1000 customers for fixed broadbar | nd 0.0 |
| <450> | | |

| ИВ Control No. 3060-0819 |
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| | unctionality in Emergency Situations RED ollection Form | ACTED FOR PUBLIC INSPECTION | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|-------|---|---|--|
| <010> | Study Area Code | 150081 | |
| <015> | Study Area Name | CITIZENS HAMMOND NY | |
| <020> | Program Year | 2018 | |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior | |
| <035> | Contact Telephone Number - Number of person identified in data line < | 030> 3153245911 ext. | |
| <039> | Contact Email Address - Email Address of person identified in data line < | <pre><030> markcpa@cit-tele.com</pre> | |
| <600> | Certify compliance regarding ability to function in emergency situations | Yes | |
| <610> | Descriptive document for Functionality in Emergency Situations | 150081ny610.pdf | |

| (700) Pric | e Offerings including Voice Rate Data | | FCC Form 481 |
|------------|---|--------------------------------------|--|
| Data Colle | ection Form | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
| <010> | Study Area Code | 150081 | |
| <015> | Study Area Name | CITIZENS HAMMOND NY | |
| <020> | Program Year | 2018 | |
| <030> | Contact Name - Person USAC should contact regarding this da | a Mark DePerrior | |
| <035> | Contact Telephone Number - Number of person identified in o | ata line <030> 3153245911 ext. | |
| <039> | Contact Email Address - Email Address of person identified in | data line <030> markcpa@cit-tele.com | |
| | esidential Local Service Charge Effective Date 1/1/ ngle State-wide Residential Local Service Charge 16.0 | 017 | |

| <703> | <a1></a1> | <a2></a2> | <a3></a3> | <b1></b1> | <b2></b2> | <b3></b3> | <b4></b4> | <b5></b5> | <c></c> |
|-------|-----------|-----------------|------------|-----------|-------------------|------------------------------|-----------------------------|-------------------------|-------------------------------|
| | | | | | Residential Local | | | Mandatory Extended Area | |
| - | State | Exchange (ILEC) | SAC (CETC) | Rate Type | Service Rate | State Subscriber Line Charge | State Universal Service Fee | Service Charge | Total per line Rates and Fees |
| | | | | | | | | | |
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| (710) Broadbrand Price Offerings | FCC Form 481 |
|----------------------------------|---|
| Data Collection Form | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | July 2013 |

| <010> | Study Area Code | 50081 |
|-------|---|----------------------|
| <015> | Study Area Name | CITIZENS HAMMOND NY |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com |

| <711> | <a1></a1> | <a2></a2> | <b1></b1> | <b2></b2> | <c></c> | <d1></d1> | <d2></d2> | <d3></d3> | <d4></d4> |
|-------|-----------|-----------------|------------------|-----------------------------|---------------------|---|--|-------------------------|--|
| | State | Exchange (ILEC) | Residential Rate | State Regulated Fees | Total Rate and Fees | Broadband Service - Download Speed (Mbps) | Broadband Service - Upload Speed (Mbps) | Usage Allowance (GB) | Usage Allowance Action Taken When Limit Reached {select} |
| | | | | | | | | | |
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| | | | , | - See attacl worksheet - | ned | | | | |
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| . , . | erating Companies lection Form | | | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|-------|-----------------------------------|---|----------------------|--|
| <010> | Study Area Code | | 150081 | |
| <015> | Study Area Name | | CITIZENS HAMMOND NY | |
| <020> | Program Year | | 2018 | |
| <030> | Contact Name - Person U | ISAC should contact regarding this data | Mark DePerrior | |
| <035> | Contact Telephone Numb | per - Number of person identified in data line <030> | 3153245911 ext. | |
| <039> | Contact Email Address - E | Email Address of person identified in data line <030> | markcpa@cit-tele.com | |
| <810> | Reporting Carrier | Citizens Telephone Company of Hammond, NY | | |
| <811> | Holding Company | Citizens Telephone Company of Hammond NY, In | 2. | |
| <812> | Operating Company | Citizens Telephone Company of Hammond, NY | | |

| 13> | <a1></a1> | <a2></a2> | <a3></a3> |
|-----|------------|-----------------|--|
| | Affiliates | SAC | Doing Business As Company or Brand Designation |
| | | | |
| | | | |
| | See at | tached worksh | oot |
| | See all | laciled worksin | pet |
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| | bal Lands Reporting lection Form | | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|-----------|--|------------------------|--|
| <010> | Study Area Code | 150081 | |
| <015> | Study Area Name | CITIZENS HAMMOND NY | |
| <020> | Program Year | 2018 | |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior | |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. | |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com | |
| <900> | Does the filing entity offer tribal land services? (Y/N) | No | |
| <910> | Tribal Land(s) on which ETC Serves | | |
| <920> | Tribal Government Engagement Obligation | Name of Attached Doo | cument |
| If your c | ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes | | |
| - | rm the status described on the attached PDF, on line 920, | | |
| demons | trates coordination with the Tribal government pursuant to | Select Yes or No or | |
| § 54.313 | B(a)(9) includes: | Not Applicable | |
| <921> | Needs assessment and deployment planning with a focus on Tribal community anchor institutions. | | |
| <922> | Feasibility and sustainability planning; | | |
| <923> | Marketing services in a culturally sensitive manner; | | |
| <924> | Compliance with Rights of way processes | | |
| <925> | Compliance with Land Use permitting requirements | | |
| <926> | Compliance with Facilities Siting rules | | |
| <927> | Compliance with Environmental Review processes | | |
| <928> | Compliance with Cultural Preservation review processes | | |
| <929> | Compliance with Tribal Business and Licensing requirements. | | |

| (1000) Voice | e and Broadband Service Rate Comparability | | FCC Form 481 |
|--------------|--|-------|--|
| Data Collect | tion Form | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | | | July 2013 |
| .040: 61 | A. A. C. I. | | |
| | tudy Area Code | | 150081 |
| | tudy Area Name | | CITIZENS HAMMOND NY |
| | rogram Year | | 2018 |
| | ontact Name - Person USAC should contact regarding this data | | Mark DePerrior |
| | ontact Telephone Number - Number of person identified in data line | | 3153245911 ext. |
| <039> Co | ontact Email Address - Email Address of person identified in data line | <030> | markcpa@cit-tele.com |
| <1000> | Voice services rate comparability certification | Yes | s |
| <1010> | Attach detailed description for voice services rate comparability compliance | | |
| | | | Name of Attached Document |
| <1020> | Broadband comparability certification | | s - Pricing is no more than the most recent applicable benchmark announced be e Wireline Competition Bureau |
| <1030> | Attach detailed description for broadband comparability compliance | | |
| | | | Name of Attached Document |

| (1100) N | o Terrestrial Backhaul Reporting | | FCC Form 481 |
|----------|--|----------------------|--|
| Data Col | lection Form | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
| | | | |
| <010> | Study Area Code | 150081 | |
| <015> | Study Area Name | CITIZENS HAMMOND NY | |
| <020> | Program Year | 2018 | |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior | |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. | |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com | |
| <1100> | Certify whether terrestrial backhaul options exist (Y/N) | Yes | |
| <1130> | Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g). | kbps | |

| (1200) Te | rms and Condition for Lifeline Customers | FCC Form 481 |
|------------------|--|---|
| Lifeline | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| Data Coll | ection Form | July 2013 |
| | | |
| <010> | Study Area Code | 150081 |
| <015> | Study Area Name | CITIZENS HAMMOND NY |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior |
| <035> | Contact Telephone Number - Number of person identified in data line <030 | |
| <039> | Contact Email Address - Email Address of person identified in data line <030 | > markcpa@cit-tele.com |
| | | 150081ny1210.pdf |
| | | 150081Ny1210.pd1 |
| | | |
| <1210> | Terms & Conditions of Voice Telephony Lifeline Plans | |
| | | |
| | | Name of Attached Document |
| | | |
| <1220> | Link to Public Website HTTP | |
| | <u>-</u> | |
| | | |
| | neck these boxes below to confirm that the attached document(s), on line 1210, | |
| or the we | bsite listed, on line 1220, contains the required information pursuant to | |
| § 54.422 | (a)(2) annual reporting for ETCs receiving low-income support, carriers must | |
| annually i | report: | |
| | | |
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | |
| | telephony service plans offered to Efferine subscribers, | |
| | | |
| <1222> | Details on the number of minutes provided as part of the plan, | |
| | | |
| <1223> | Additional charges for toll calls, and rates for each such plan. | |
| 12207 | The state of the s | |
| | | |

| (2005) P | rice Cap Carrier Additional Documentation | | FCC Form 481 |
|-----------|---|----------------------|---|
| Data Col | lection Form | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| Including | Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers | | July 2013 |
| | | | |
| <010> | Study Area Code | 150081 | |
| <015> | Study Area Name | CITIZENS HAMMOND NY | |
| <020> | Program Year | 2018 | |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior | |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. | |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com | |
| | | | |

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

| <2011> | 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of | | |
|---------|---|---|--|
| <2022> | Incremental Support. Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Tochnology Opportunities Brogram for | | |
| <2023> | Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only. The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers | | |
| <2024A> | year three - 54.313(b)(2)(ii). Round 2 recipients only. Round 2 Recipient of Incremental Support? | | |
| <2024B> | Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only. | Name of Attached Document Listing Required Information | |
| <2025A> | Round 2 Recipient of Incremental Support? | | |
| <2025B> | Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013). | Name of Attached Document Listing Required Information | |
| <2015> | 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4) | | |

| (2005) Price Cap | Carrier Additional Documentation | FCC Form 481 | |
|-------------------|--|---|---------------------------------------|
| Data Collection F | Form | | . 3060-0986/OMB Control No. 3060-0819 |
| Including Rate-of | f-Return Carriers affiliated with Price Cap Local Exchange Carriers | July 2013 | |
| Price Ca | p Carrier Connect America ICC Support {47 CFR § 54.313(d)} | | |
| <2016> | Certification support used to build broadband | | |
| Connect | America Phase II Reporting {47 CFR § 54.313(e)} | | |
| <2017A> | Connect America Fund Phase II recipient? | | |
| <2017C> | Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016. | | |
| <2018> | Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A) | Name of Attached Document Listing Required Information | |
| <2019> | Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C) | | |

| (3005) Rate Of Return Carrier Additional Documentation | FCC Form 481 |
|--|---|
| Data Collection Form | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | July 2013 |

| <010> | Study Area Code | 150081 |
|-------|---|----------------------|
| <015> | Study Area Name | CITIZENS HAMMOND NY |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com |

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

| | Progress Report on 5 Year Plan | | | |
|----------------------------|--|---------------------------------------|-----------------------|------------------|
| (3009) | Carrier certifies to 54.313(f)(1)(iii) | | | |
| (3010A) | Certification of Public Interest Obligations {47 CFR § | Υe | es - Attach Certifica | |
| (22122) | 54.313(f)(1)(i)} | SAU akad Daw | titi V. Bandad | 150081ny3010.pdf |
| (3010B) | Please Provide Attachment | Name of Attached Docur Information | ment Listing Requirea | |
| (3012A) | Community Anchor Institutions {47 CFR § | No - No New Community | Anchors | |
| (3012B) | 54.313(f)(1)(ii)} Please Provide Attachment | Name of Attached Docur | ment Listing Required | |
| /2012\ | ls your company a Privately Held ROR Carrier 1/17 CER | Information (Yes/No) | \odot \bigcirc | |
| (3013) | Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)} | (Yes/No) | | |
| (3014) | If yes, does your company file the RUS annual report | (Yes/No) | • 0 | |
| (3015) | Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) | | · . | |
| (3016) | Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows | | | 150081ny3017.pdf |
| (3017) | If the response is yes on line 3014, attach your company's RUS annual report and all required documentation | Name of Attached Docui Information | ment Listing Required | |
| (3018) (3019) (3020) | If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers Document(s) for Balance Sheet, Income Statement | (Yes/No) | | |
| | and Statement of Cash Flows | | | |
| (3021) | Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: | | | |
| (3022) | Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers | | | |
| (3023) | Underlying information subjected to a review by an independent certified public accountant | | | |
| (3024) | Underlying information subjected to an officer certification. | | | |
| (3025) | Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows | | | |
| (3026) | Attach the worksheet listing required information | Name of Attached Docui Information | ment Listing Required | |

REDACTED FOR PUBLIC INSPECTION (3005) Rate Of Return Carrier Additional Documentation (Continued) Data Collection Form OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

| <010> | Study Area Code | 150081 |
|-------|---|----------------------|
| <015> | Study Area Name | CITIZENS HAMMOND NY |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com |

| Financial Data Summary |
|---|
| (3027) Revenue |
| (3028) Operating Expenses |
| (3029) Net Income |
| (3030) Telephone Plant In Service(TPIS) |
| (3031) Total Assets |
| (3032) Total Debt |
| (3033) Total Equity |
| (3034) Dividends |
| |

| (4005) Rural Broadband Experiment Additional Documentation Data Collection Form | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
|---|---|
| | July 2013 |

| <010> | Study Area Code | 150081 |
|-------|---|-------------------------------|
| <015> | Study Area Name | CITIZENS HAMMOND NY |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior |
| <035> | Contact Telephone Number - Number of person identified in data li | ne <030> 3153245911 ext. |
| <039> | Contact Email Address - Email Address of person identified in data li | ne <030> markcpa@cit-tele.com |

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

speed and data usage allowances available in the

relevant geographic area.

4003b. Provide the number, names and addresses Name of Attached Document Listing Required Information of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year. Broadband Deployment Locations - FCC 14-98 (paragraph 80) **4004a**. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing Name of Attached Document Listing Required Information deadline for the FCC Form 481. 4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband Name of Attached Document Listing Required Information

| Certification - Reporting Carrier | | FCC Form 481 |
|-----------------------------------|------|--|
| Data Collection Form | | OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
| <010> Study Area (| Code | 150081 |
| <015> Study Area I | Name | CITIZENS HAMMOND NY |
| <020> Program Yea | ar | 2018 |

Mark DePerrior 3153245911 ext.

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<030> Contact Name - Person USAC should contact regarding this data

Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Email Address - Email Address of person identified in data line <030> markcpa@cit-tele.com

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Study Area Code of Reporting Carrier: Filing Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

| Certification - Agent / Carrier Data Collection Form | | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013 |
|---|---|--|
| <010> | Study Area Code | 150081 |
| <015> | Study Area Name | CITIZENS HAMMOND NY |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com |

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

| certify that (Name of Agent)JSI | | |
|---|---|--|
| Name of Authorized Agent: JSI | | |
| Name of Reporting Carrier: CITIZENS HAMMOND NY | | |
| Signature of Authorized Officer: CERTIFIED ONLINE | Date: 06/27/2017 | |
| Printed name of Authorized Officer: Mark DePerrior | | |
| Title or position of Authorized Officer: Controller | | |
| Telephone number of Authorized Officer: 3153245911 ext. | | |
| Study Area Code of Reporting Carrier: 150081 | Filing Due Date for this form: 07/03/2017 | |

TO BE COMPLETED BY THE AUTHORIZED AGENT:

| | Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier |
|----------|--|
| | |
| , | gent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided ta reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate. |
| Name c | of Reporting Carrier: CITIZENS HAMMOND NY |
| Name c | of Authorized Agent Firm: JSI |
| Signatu | ure of Authorized Agent or Employee of Agent: CERTIFIED ONLINE Date: 06/26/2017 |
| Name c | of Authorized Agent Employee: JSI |
| Title or | r position of Authorized Agent or Employee of Agent Regulatory Consultant |
| Telepho | none number of Authorized Agent or Employee of Agent: 3034597590 ext. |
| Study A | Area Code of Reporting Carrier: 150081 Filing Due Date for this form: 07/03/2017 |
| | Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001. |

Attachments

| (700) Price Offerings including Voice Rate Data | FCC Form 481 |
|---|---|
| Data Collection Form | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | July 2013 |

| <010> | Study Area Code | 150081 |
|-------|---|----------------------|
| <015> | Study Area Name | CITIZENS HAMMOND NY |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com |

<701> Residential Local Service Charge Effective Date 1/1/2017
<702> Single State-wide Residential Local Service Charge 16.0

<703>

| <a2></a2> | <a3></a3> | <b1></b1> | <b2></b2> | <b3></b3> | <b4></b4> | <b5></b5> | <c></c> |
|-----------|--------------------------------|-----------|-------------------|---|--|--|---|
| | | | Residential Local | | | Mandatory Extended Area | |
| | SAC (CETC) | Rate Type | Service Rate | State Subscriber Line Charge | State Universal Service Fee | Service Charge | Total per line Rates and Fees |
| | | FR | 16.0 | 0.0 | 0.0 | 0.0 | 16.0 |
| Macomb | | FR | 16.0 | 0.0 | 0.0 | 0.0 | 16.0 |
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| | Exchange (ILEC) Hammond Macomb | Hammond | Hammond FR | Exchange (ILEC) SAC (CETC) Rate Type Service Rate Hammond FR 16.0 | Exchange (ILEC) SAC (CETC) Rate Type Service Rate State Subscriber Line Charge Hammond FR 16.0 0.0 | Exchange (ILEC) SAC (CETC) Rate Type Service Rate State Subscriber Line Charge State Universal Service Fee Hammond FR 16.0 0.0 0.0 | Exchange (ILEC) SAC (CETC) Rate Type Service Rate State Subscriber Line Charge State Universal Service Fee Service Charge Hammond FR 16.0 0.0 0.0 0.0 0.0 |

| (710) Broadband Price Offerings | FCC Form 481 |
|---------------------------------|---|
| Data Collection Form | OMB Control No. 3060-0986/OMB Control No. 3060-0819 |
| | July 2013 |

| <010> | Study Area Code | 150081 |
|-------|---|----------------------|
| <015> | Study Area Name | CITIZENS HAMMOND NY |
| <020> | Program Year | 2018 |
| <030> | Contact Name - Person USAC should contact regarding this data | Mark DePerrior |
| <035> | Contact Telephone Number - Number of person identified in data line <030> | 3153245911 ext. |
| <039> | Contact Email Address - Email Address of person identified in data line <030> | markcpa@cit-tele.com |

| <711> | <a1></a1> | <a2></a2> | <b1></b1> | <b2></b2> | <c> <d1></d1></c> | <d2></d2> | · <d3></d3> | | <d4></d4> |
|-------|-----------|-----------------|---------------------|-------------------------|-------------------------|---------------------|---|-------------------------|--|
| · | State | Exchange (ILEC) | Residential Rate | State Regulated Fees | Total Rates and Fees | Broadband Service - | Broadband Service -Upload Speed (Mbps) | Usage Allowance (GB) | Usage Allowance Action Taken When Limit Reached {select} |
| | NY | All | 19.95 | 0.0 | 19.95 | 5.0 | 1.0 | 999999.0 | Other, No Usage Allowance |
| | NY | Hammond | 40.95 | 0.0 | 40.95 | 0.512 | 0.128 | 0.0 | Other, Unlimited |
| | NY | Hammond | 57.95 | 0.0 | 57.95 | 1.0 | 0.256 | 0.0 | Other, Unlimited |
| | NY | Hammond | 89.95 | 0.0 | 89.95 | 2.0 | 1.0 | 0.0 | Other, Unlimited |
| | NY | Hammond | 119.95 | 0.0 | 119.95 | 5.0 | 2.0 | 0.0 | Other, Unlimited |
| | NY | Macomb | 40.95 | 0.0 | 40.95 | 0.512 | 0.128 | 0.0 | Other, Unlimited |
| | NY | Macomb | 57.95 | 0.0 | 57.95 | 1.0 | 0.128 | 0.0 | Other, Unlimited |
| | NY | Macomb | 89.95 | 0.0 | 89.95 | 2.0 | 1.0 | 0.0 | Other, Unlimited |
| | NY | Macomb | 119.95 | 0.0 | 119.95 | 5.0 | 2.0 | 0.0 | Other, Unlimited |
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| . , . | erating Companies lection Form | | | FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 | | |
|-------|-----------------------------------|---|----------------------|---|--|--|
| | | | | July 2013 | | |
| <010> | Study Area Code | | 150081 | | | |
| <015> | Study Area Name | | CITIZENS HAMMOND NY | | | |
| <020> | Program Year | | 2018 | | | |
| <030> | Contact Name - Person l | JSAC should contact regarding this data | Mark DePerrior | | | |
| <035> | Contact Telephone Num | ber - Number of person identified in data line <030> | 3153245911 ext. | | | |
| <039> | Contact Email Address - | Email Address of person identified in data line <030> | markcpa@cit-tele.com | | | |
| <810> | Reporting Carrier | Citizens Telephone Company of Hammond, NY | | | | |
| <811> | Holding Company | Citizens Telephone Company of Hammond NY, | nc. | | | |
| <812> | Operating Company | Citizens Telephone Company of Hammond, NY | | | | |

| <813> | <a1></a1> | <a2></a2> | <a3></a3> |
|----------------|----------------------------|-----------|--|
| | Affiliates | SAC | Doing Business As Company or Brand Designation |
| : = | Citizens Cablevision, Inc. | | Citizens Cablevision, Inc. |
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Citizens Telephone Company of Hammond, NY, Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its 2005 ETC Order,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis. ³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement." ⁴

Citizens Telephone Company of Hammond, NY, Inc. ("Citizens") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. Citizens is subject to service quality standards and consumer protection obligations under both federal and state law. These standards and obligations include, but are not limited to, the following: (1) providing copies of a tariff, pending tariff, or rate filing which disclose rates, terms and conditions of service to customers in accordance with the New York Code of Rules and Regulations (NYCRR) Title 16, Volume C, Chapter 6,

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

Subchapter A, 602.4; (2) adherence to state service quality standards and consumer protection requirements governing telephone providers under NYCRR Title 16, Volume C, Chapter 6, Subchapter A service, Parts 600, 602, 603, and 609; (3) truth-in-billing requirements; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In addition, Citizens certifies compliance with broadband specific consumer protection obligations under both state rule and federal law. The obligation under state rule is NYCRR Title 16, Part 605 as it pertains to common carriage and the delivery of broadband services as a separate service from the provision of content. The federal law obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

Citizens Telephone Company of Hammond, NY, Inc.'s demonstration of ability to function in emergency situations for voice and broadband services:

Citizens Telephone Company of Hammond, NY, Inc. ("Citizens") hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).¹ Citizens network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as the Company has access to fuel.

The company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

Company complies with the FCC's backup power requirements, effective October 16, 2015.

Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

Received: 05/30/2012

REDACTED FOR PUBLIC INSPECTION

Status: EFFECTIVE Effective Date: 07/01/2012

P.S.C. No. 2 - Telephone

New York State Telecommunications Association, Inc.

Section 9

Second Revised Page 3

Superseding First Revised Page 3

SPECIAL EQUIPMENT, SERVICES, AND PROGRAMS

A. LIFELINE TELEPHONE SERVICE

- 1. Lifeline Telephone Service Options
 - Description a.
 - 1. Lifeline Discounted Service

This service provides a flat rate federal discount of \$9.25, consisting of a \$6.50 reduction of the Federal Subscriber Line Charge and a \$2.75 reduction in the monthly rate for local exchange telephone service for residential customers. Qualified (C) customers may choose any type or grade of local telephone service, including bundled services that are normally offered by the Company.

1 A. Additional Lifeline Discount

This service provides the discount as outlined in A.1.a.1 above and may provide an additional discount equal to the serving company's increase in residential basic local exchange service, as authorized by the NYS Department of Public Service in Case No. 07-C-0349, released March 4, 2008, whereby the NY Commission authorized certain companies to increase basic local service rates up to \$2.00 per year for 2 years. The discount can be found on Addendum 1 of the individual Company tariff for those companies offering the Additional Lifeline Discount.

Date Issued: May 30, 2012

Caroline Hill, Director Tariffs Issued by:

NYSTA, Inc., 20 Corporate Woods Boulevard, Albany, NY 12210

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Date Effective: July 1, 2012

Received: 05/30/2012

REDACTED FOR PUBLIC INSPECTION

Status: EFFECTIVE Effective Date: 07/01/2012

P.S.C. No. 2 - Telephone

New York State Telecommunications Association, Inc.

Section 9

First Revised Page 3.1

Superseding Original Page 3.1

SPECIAL EQUIPMENT, SERVICES, AND PROGRAMS

A. LIFELINE TELEPHONE SERVICE

(D)

Date Issued: May 30, 2012 Date Effective: July 1, 2012

Issued by: Caroline Hill, Director Tariffs
NYSTA, Inc., 20 Corporate Woods Boulevard, Albany, NY 12210

Received: 03/29/2012

REDACTED FOR PUBLIC INSPECTION

Status: EFFECTIVE Effective Date: 04/29/2012

P.S.C. No. 2 - Telephone

New York State Telecommunications Association, Inc.

Section 9

First Revised Page 4

Superseding Original Page 4

SPECIAL EQUIPMENT, SERVICES, AND PROGRAMS

A. LIFELINE TELEPHONE SERVICE (cont'd)

- 1. Lifeline Telephone Service Options (cont'd)
 - b. General

Qualified customers may choose to apply the federal Lifeline credit to any of the company's local service offerings, including any local bundled service offering, basic local service, or message rate service. Message rate Lifeline service is available only where central office facilities permit. For connection of new service, service connection charges apply unless the customer qualifies for connection assistance under the Tribal Lands Link Up program.

(C)

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Service connection charges do not apply to change existing service from:

- 1. Message or flat rate services to Lifeline service.
- 2. Lifeline service to non-Lifeline services.

+

Issued in Compliance with FCC Order in Dockets: WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23

Date Issued: March 29, 2012 Date Effective: April 29, 2012

Issued by: Robert R. Puckett, President

NYSTA, Inc., 20 Corporate Woods Boulevard, Albany, NY 12211

Status: EFFECTIVE Effective Date: 07/01/2012

P.S.C. No. 2 - Telephone

New York State Telecommunications Association, Inc.

Section 9

First Revised Page 4.1

Superseding Original Page 4.1

SPECIAL EQUIPMENT, SERVICES, AND PROGRAMS

A. LIFELINE TELEPHONE SERVICE (cont'd)

2. Regulations

- a. These services are restricted to low income residential customers. To qualify for Lifeline service a customer must certify and provide documentation as income eligible. For a consumer to be eligible under the income requirements, the consumer's household income as defined in § 54.400(f) of the FCC Rules must be at or below 135% of the Federal Poverty Guidelines for a household of that size or a recipient of benefits from any one of the following Entitlement Programs:
- (C)

- 1. Medicaid;
- 2. Supplemental Nutrition Assistance Program (SNAP) F/K/A Food stamps;
- 3. Supplemental Security Income;
- 4. Federal Public Housing Assistance (Section 8);
- 5. Low-Income Home Energy Assistance Program (LIHEAP);
- 6. National School Lunch Program's free lunch program;
- 7. Temporary Assistance for Needy Families/SafetyNet; (C)
- 8. Veterans Disability Pension
- 9. Veterans Surviving Spouse Pension

Issued in Compliance with FCC Order in Dockets: WC Docket No. 11-42, WC Docket No. 03-109, CC

Docket No. 96-45, WC Docket No. 12-23

Date Issued: May 30, 2012 Date Effective: July 1, 2012

Issued by: Robert R. Puckett, President

NYSTA, Inc., 20 Corporate Woods Boulevard, Albany 12211

Received: 03/29/2012

REDACTED FOR PUBLIC INSPECTION

Status: EFFECTIVE Effective Date: 04/29/2012

P.S.C. No. 2 - Telephone

New York State Telecommunications Association, Inc.

Section 9
First Revised Page 5
Superseding Original Page 5

SPECIAL EQUIPMENT, SERVICES, AND PROGRAMS

A. LIFELINE TELEPHONE SERVICE (cont'd)

- 2. Regulations (cont'd)
 - b. The Lifeline discount is effective upon receipt of a completed form of eligibility. If the form is not returned, no further action is taken by the Company to establish eligibility.

c. The Company, in coordination with appropriate agencies and the Lifeline Customer, will require Lifeline customers to be re-certified, on an annual basis. Lifeline customers will need to certify that they continue to be eligible to receive these Lifeline benefits and that they are not receiving benefits from another company. If, a customer is identified as being ineligible, the customer will be notified that unless the information is shown to be in error, the Lifeline discount will be discontinued. The customer will be billed for discounts received for the time that they were proven to be ineligible for the service.

- Locality Charge Waiver
 Customers receiving Lifeline Telephone Service will have applicable locality charges waived each month while they are receiving the Lifeline Assistance.
- Voluntary Toll Blocking (Restriction)
 Customers receiving Lifeline service can voluntarily request and receive toll blocking (call restriction), third number billing/collect call restriction without a monthly charge. There will be no record order charge to add these types of restrictions (blocking).

Issued in Compliance with FCC Order in Dockets: WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23

Date Issued: March 29, 2012 Date Effective: April 29, 2012

Issued by: Robert R. Puckett, President

NYSTA, Inc., 20 Corporate Woods Boulevard, Albany, NY 12211

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(C)

Citizens Telephone Company of Hammond, NY (SAC 150081)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Citizens Telephone Company of Hammond, NY hereby certifies that throughout 2017, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.

ATTACHMENT - LINE 3017 ATTACHMENT REDACTED IN ENTIRETY